

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Federally-Enforceable permit No. F-06-005 (Renewal)  
MODERN WELDING COMPANY OF OWENSBORO, INC.  
OWENSBORO, KENTUCKY  
January 25, 2006  
MIN WANG  
AFS Plant I.D. 21-059-00013  
AI# 37838, APE# 20050001

**SOURCE DESCRIPTION:**

Modern Welding Company of Owensboro, Inc is a fabricated metal manufacturing facility located at 1450 East Parrish Avenue, Owensboro, Kentucky.

**COMMENTS:**

Modern Welding Company of Owensboro, Inc has applied for a renewal of their conditional major permit which was originally issued on September 1, 2000 (F-00-003) and revised January 22, 2003. The only change in the renewed permit will be the method by which styrene emissions are calculated. Emissions of this compound are limited to 9 tons per year. The source submitted data showing that the original method overestimated emissions of this HAP. Language concerning the new method of calculating styrene emissions has been added to the applicable portions of the permit (E.P. 03, 05 & 06). An NOV was issued for excess styrene emissions on December 1, 2004 but was later rescinded when the new method of calculating emissions of this HAP was verified by the Permit Review Branch.

Modern Welding requests emission limitation to restrict the plantwide VOC emission rates to be less than 90 tons per year. Also to preclude Title V applicability, the emissions of combined hazardous air pollutants shall not exceed 22.5 tons per year, the emissions of an individual hazardous air pollutants shall not exceed 9.0 tons per year, and the plantwide particulate emission rates are limited to less than 90 tons per year. Therefore, 401 KAR 52:030, Federally-enforceable permits for non-major sources, is applicable for the source.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

1. Volatile organic compound (VOC) emissions shall not exceed 90 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.
2. Hazardous air pollutants (HAPs) emissions shall not exceed 9 tons per year individually and 22.5 tons per year combined based on a rolling 12 month total for the entire source to preclude a major source Title V review.
3. Particulate matter (PM) emissions shall not exceed 90 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.